

1 two pages of the actual payment schedule. You have the book  
2 there I think.

3 MR. HILL: Okay.

4 JUDGE CHACHKIN: You got it? That's the note, I  
5 think.

6 MR. HILL: No, I only --

7 JUDGE CHACHKIN: No, you don't have ii there I  
8 gather, is that double -- two i's there?

9 MR. HILL: Is this -- yes.

10 MR. COHEN: All right, one moment, I'm looking here.

11 JUDGE CHACHKIN: All right, the witness has it, now,  
12 the witness has it now, I believe.

13 MR. COHEN: Sorry about that.

14 BY MR. COHEN:

15 Q Pastor, I -- the document will speak for itself but  
16 I'm interested in your understanding of it. Do you agree with  
17 me that there's no provision in the text of the note for any  
18 payment --

19 JUDGE CHACHKIN: Well, I don't think the witness has  
20 the note yet, all right.

21 MR. COHEN: Oh, oh, I'm sorry, Your Honor, I thought  
22 he did. Tell me when you've found it then.

23 JUDGE CHACHKIN: Do you have ii there?

24 MR. HILL: H -- I -- and I have ii.

25 JUDGE CHACHKIN: Oh, now, he has the double -- all

1 right.

2 MR. HILL: Now, I have it, yeah.

3 JUDGE CHACHKIN: All right.

4 BY MR. COHEN:

5 Q First let me ask you the question and then spend as  
6 much time as you need, Pastor. As I said, the document will  
7 speak for itself but your understanding is important to me.  
8 Do you find any provision in the text of the note for any  
9 payment prior to the maturity date of January 1, 1998? That's  
10 the question.

11 A Other than the monthly pay -- the \$27,000.

12 Q This is a schedule, I'm talking about in the text of  
13 the note.

14 A No.

15 Q So the answer to my question is no, is that correct?

16 A That's correct.

17 Q Now, so the record's clear, the source of your  
18 information of all this was all learned from Mr. Topel since  
19 you've arrived in Washington to prepare for your testimony,  
20 correct?

21 A That -- well, he pointed this out to me, yes.

22 Q And you weren't aware of this at the time -- prior  
23 to the time Mr. Topel pointed it out.

24 A I had not seen a physical note.

25 Q Now, I want you to look at what's been received in

1 evidence in this proceeding as Bureau Exhibit 399. Can you  
2 help the witness.

3 A Um-hum.

4 Q And before you look at that, let me just ask you  
5 another question. You say you haven't see the note but isn't  
6 it true that as of the time of the date of your deposition you  
7 had no knowledge, Pastor, of whether Trinity owed any money --  
8 excuse me, of whether NMTV owed any money to Trinity?

9 A I was aware that Trinity had advanced monies to --

10 Q NMTV.

11 A -- NMTV.

12 Q But you didn't know how much money had been  
13 advanced.

14 A No, and proof of which is, I think the minutes will  
15 reflect I was -- I urged that we set up arrangements to as  
16 quickly as possible pay off Trinity whatever it was.

17 Q Now, look at the memorandum date July 31, 1992.  
18 Have you ever seen that document before this minute?

19 A Not before this meeting.

20 JUDGE CHACHKIN: Not before now.

21 MR. COHEN: Right now.

22 MR. HILL: Now.

23 JUDGE CHACHKIN: Yes.

24 BY MR. COHEN:

25 Q Did you understand whether this document -- and

1 spend as much time as you need to look at it -- whether this  
2 document has any relationship, bears any relationship to the  
3 \$5,000,000 note?

4 A I think it's a part of the \$5,000,000 note and if --  
5 wait a minute, wait a minute, there is a --

6 Q You've never seen this document before, though.

7 A No.

8 Q Yes.

9 A But there is another page that has exactly  
10 \$1,000,000 added to this that I've seen in my reading since  
11 I've been here and that would be my conclusion that it's a  
12 part of it not in addition to it, but a part of it.

13 Q But you say you've never seen this July 31, 1992 --

14 A No.

15 Q Yeah, were you aware -- you were a board member when  
16 this -- on July 31, 1992, were you aware when you were a board  
17 member that such a memorandum was executed?

18 A I haven't seen it before.

19 JUDGE CHACHKIN: And you had no knowledge of it  
20 either.

21 MR. HILL: No.

22 MR. COHEN: Thank you. I'm going to go on to one  
23 other matter and then I'm going to --

24 BY MR. COHEN:

25 Q Pastor, would you please refer to Bureau Exhibit 376

1 and maybe you can help the Pastor if he needs help, okay.

2 JUDGE CHACHKIN: Is that the same volume we're  
3 talking about Volume 6?

4 MR. TOPEL: Yeah, I think the witness is confused  
5 between the Bureau exhibits and TBF exhibits.

6 MR. COHEN: Oh, it's easy to be confused, Pastor, so  
7 don't feel like the Lone Ranger.

8 MR. HILL: Okay.

9 JUDGE CHACHKIN: All right, the witness has the  
10 document in front of him.

11 MR. HILL: Yeah.

12 BY MR. COHEN:

13 Q Now, would you please read that document to yourself  
14 and tell me when you've read it.

15 A All right, I'm through with it.

16 Q Now, you became a director just on -- just about  
17 this date, my question -- you're not shown as receiving a  
18 copy. My question is, were you ever supplied a copy of this  
19 letter by anybody?

20 A No.

21 Q Just a couple more questions. I'm not going to be  
22 asking you any questions about this document but I do want to  
23 find out whether you ever were sent a copy of it and this is  
24 the document entitled "Consolidated Opposition to Petitions to  
25 Deny" filed by February -- filed on February 21, 1992 on

1 | behalf of Trinity Broadcasting of Florida, Inc. I'm not going  
2 | to be asking you any questions it pertains to -- whatever it  
3 | pertains to. My question is did you -- were you ever sent a  
4 | copy of it?

5 |       A     I don't recall that I was sent a copy of this.

6 |       Q     Thank you.

7 |           MR. TOPEL: Has the date been --

8 |           MR. COHEN: February 21, 1992.

9 |           BY MR. COHEN:

10 |       Q     Finally, I want to show you a document that's been  
11 | admitted into evidence called a request in this proceeding,  
12 | it's called "A Request for Declaratory Ruling of National  
13 | Minority Television, Inc.". Were you ever sent a copy of that  
14 | document? Have you ever seen it before this minute?

15 |       A     Not to my knowledge.

16 |           JUDGE CHACHKIN: What is the exhibit number of that  
17 | document?

18 |           MR. COHEN: That's Exhibit 216, Your Honor.

19 |           JUDGE CHACHKIN: Is that Bureau Exhibit 216?

20 |           MR. COHEN: No, no, this is Glendale Exhibit 216.

21 |           JUDGE CHACHKIN: Glendale Exhibit 216, all right.

22 |           MR. COHEN: Your Honor, yesterday -- I'm embarrassed  
23 | that I didn't write it down, I marked for identification when  
24 | Mrs. Duff was testifying, a letter from the Commission to NMTV  
25 | dated March 30, 1992, when she commenced --

1 JUDGE CHACHKIN: When she commenced it?

2 MR. COHEN: When she commenced her testimony I  
3 showed her this letter and I didn't write down the number and  
4 I --

5 JUDGE CHACHKIN: I don't believe it's marked for  
6 identification.

7 MR. COHEN: No, oh, wait a minute. Commission  
8 letter to NMTV dated March 30, 1992, I thought I did --

9 JUDGE CHACHKIN: Oh, the declaratory ruling, that  
10 was 216. Okay, is that what you're talking about, request for  
11 -- no, the request for -- wait a minute, I --

12 MR. COHEN: All right, that's it, Your Honor.

13 JUDGE CHACHKIN: It was not marked for  
14 identification.

15 MR. COHEN: But it was not marked, okay, that's why  
16 I don't have it, thank you. Finally, Pastor, I want to show  
17 you a letter from the Federal Communications Commission to  
18 NMTV and I think I should now mark it, Your Honor, as this --

19 JUDGE CHACHKIN: All right, the record's clear --  
20 what's my next number?

21 MR. TOPEL: The next number's 219.

22 MR. COHEN: I don't have enough copies, I'll have to  
23 --

24 JUDGE CHACHKIN: Well, you supplied us already with  
25 copies, you did supply copies yesterday.

1 MR. COHEN: Oh, I did supply copies, well, then  
2 that's why.

3 JUDGE CHACHKIN: I believe everybody has a copy of  
4 it.

5 MR. SHOOK: Yeah, I could use an extra here.

6 JUDGE CHACHKIN: I don't know if the reporter has a  
7 -- I don't think you -- I think --

8 MR. COHEN: I'm going to give them too to the  
9 reporter.

10 JUDGE CHACHKIN: Yes, I think that's the only person  
11 who doesn't have a copy.

12 MR. COHEN: Thank your, Your Honor, now you're  
13 refreshing my recollection. Let me just give you one right  
14 for the minute. I want to show you a letter that --

15 JUDGE CHACHKIN: Do you want it marked for  
16 identification?

17 MR. COHEN: Yes.

18 JUDGE CHACHKIN: All right --

19 MR. COHEN: Excuse me, Your Honor, it's Bureau --  
20 it's Glendale Exhibit 219, a letter from the Commission to  
21 NMTV dated March 30, 1992, it's a -- three pages, Your Honor.

22 JUDGE CHACHKIN: The document described is marked  
23 for identification as Glendale Exhibit 219.

24 (Whereupon, the document referred to  
25 as Glendale Exhibit 219 was hereby



1 marked for identification.)  
2 MR. TOPEL: Excuse me, how many pages did you say it  
3 was?  
4 MR. COHEN: I thought it was three. Mine is three,  
5 do you have more than page --  
6 MR. TOPEL: All right, I thought I heard you say  
7 two, that's all --  
8 MR. COHEN: Three pages.  
9 JUDGE CHACHKIN: Three pages.  
10 BY MR. COHEN:  
11 Q And I'm not going to be asking you about the  
12 document, Pastor, what I want to know is whether you were ever  
13 supplied by anybody a copy of that letter from the Commission  
14 to NMTV?  
15 A Not to my knowledge.  
16 MR. COHEN: Thank you. I have no further questions  
17 and thank you, Your Honor.  
18 MR. HILL: Okay.  
19 JUDGE CHACHKIN: Do you want this received, a part  
20 --  
21 MR. COHEN: Yes, I'd -- well, yes, I'd like you to  
22 take official notice of it, Your Honor.  
23 JUDGE CHACHKIN: All right, any objection purpose of  
24 taking official notice of this Commission letter?  
25 MR. SHOOK: No, sir.

1 JUDGE CHACHKIN: Glendale Exhibit 219 is received.  
2 (Whereupon, the document previously  
3 identified as Glendale Exhibit 219  
4 was hereby received into evidence.)

5 JUDGE CHACHKIN: Do you have any further questions  
6 of this witness?

7 MR. COHEN: No, sir.

8 JUDGE CHACHKIN: Bureau have any questions?

9 MR. SHOOK: We do, Your Honor.

10 JUDGE CHACHKIN: Go ahead, Mr. Shook.

11 CROSS-EXAMINATION

12 BY MR. SHOOK:

13 Q Thank you, Your Honor. Reverend Hill, in responding  
14 to one of the questions of Mr. Cohen about the number of  
15 meetings that you had participated in as a director for NMTV,  
16 I believe you testified that you had attended eight to ten or  
17 participated in eight to ten such meetings. Now, that would  
18 be from -- when you're nodding your head affirmatively you  
19 mean yes?

20 A Yes.

21 Q The participation or attendance, was that in your  
22 mind from October of 1991 when you first became a board member  
23 to the present time?

24 A Yes.

25 Q Do you recall how many such meetings you have

1 participated in or attended in the year 1993?

2       A     Not more than two, I'm sure. Not where we attended,  
3 now we've had conference calls.

4       Q     Well, that's what I'm trying to find out. In  
5 evidence we have as Bureau Exhibit 412 minutes of an NMTV  
6 board meeting that took place on April 20, 1993 and at that  
7 meeting, according to the minutes, Bill Aguilar's regu --  
8 resignation was accepted by the board and Armando Ramirez was  
9 elected to the board, do you recall that?

10       A     Yes.

11       Q     Now, in 1993, other than that meeting, what other  
12 meetings have taken place of the board of NMTV that you have  
13 attended or participated in?

14       A     Well, of course, we had a meeting prior to that  
15 concerning Brace, the Community Brace and I believe that that  
16 would be in 1993 and then we've had telephone conference board  
17 meetings, one of which would be -- and I'm sure again, that  
18 was in '93, with reference to the conflict of the attorneys as  
19 to whether or not there was conflict or should we hire a  
20 different set of attorneys or just what.

21       Q     Do you recall any other subject matters that came up  
22 as a result of meetings occurring in 1993?

23       A     No, I think those are the three basic subjects that  
24 we discussed.

25       Q     To your knowledge, are the meetings that you have

1 just referred to all reduced to minutes somewhere?

2 A I have seen them since being here, the minutes.

3 JUDGE CHACHKIN: Well, but counsel is referring to  
4 all these confer -- all these meetings that you've just  
5 described.

6 MR. HILL: Yes.

7 JUDGE CHACHKIN: Do you know, in fact, whether or  
8 not the minutes in each one of these instances -- minutes were  
9 kept?

10 MR. HILL: I would say yes, yes.

11 BY MR. SHOOK:

12 Q Now, before a meeting takes place, is there any  
13 practice that you're aware of in terms of the notification  
14 that a board member would receive?

15 A We generally receive calls with several possible  
16 dates as to whether or not we could meet on one of those dates  
17 and then we would get a call back from Paul's office saying  
18 that it appears that everybody can meet on such and such a  
19 date or no one can meet and we'll do it by telephone.

20 Q Prior to the time a meeting takes place, do you  
21 receive any information as to what agenda the meeting will  
22 have?

23 A Verbally I have received information as to generally  
24 what the meeting would be about.

25 Q Okay, I'd like to go over with you some of the

1 meetings for which we have minutes and if you could, let me  
2 know, you know, what agenda was presented to you beforehand,  
3 if any. Now --

4 A Beforehand?

5 Q Yes, sir.

6 A Um-hum.

7 Q First, I'd like to refer you to the Bureau Exhibit  
8 377, that would be in Volume 6. I believe that's the binder  
9 you have in front of you.

10 JUDGE CHACHKIN: The one that you have in front of  
11 you.

12 MR. HILL: Yes.

13 JUDGE CHACHKIN: 377 did you say?

14 MR. SHOOK: Yes, sir.

15 MR. HILL: Page --

16 JUDGE CHACHKIN: No, wait, it's -- each one has a  
17 tab but --

18 MR. HILL: Oh, yeah, I see it.

19 JUDGE CHACHKIN: It's a special meeting of October  
20 2, 1991.

21 MR. HILL: 377 -- 376 -- okay.

22 JUDGE CHACHKIN: The witness has the document.

23 BY MR. SHOOK:

24 Q Now, sir, take a minute or so to look through the  
25 minutes to familiarize yourself with them.

1           A     Okay.

2           Q     Reverend Hill, according to these minutes, you  
3 participated in this meeting by a telephone conference call.

4           A     Yes.

5           Q     Looking at the second paragraph, did you receive any  
6 prior notice that Reverend Crouch was going to be speaking  
7 about the Wilmington, Delaware situation and what was going on  
8 with the Federal Communications Commission or is this  
9 something you learned at the time of the conference call?

10          A     Well, I wasn't aware that he was going to speak  
11 about it in the meeting. I was aware of the Philadelphia  
12 situation in terms of possibility of purchasing a station in  
13 Philadelphia.

14          Q     Could you describe for us what your awareness was.

15          A     That we were trying to purchase one and that I was  
16 also in contact -- at least they were in contact with me --  
17 ministers of the Philadelphia area who was in support of the  
18 idea and hoping that it would come through.

19          Q     Your awareness of the efforts to acquire the  
20 Philadelphia station came from whom?

21          A     Well, Paul, of course, first told me just in  
22 conversation that they were trying to -- before I became a  
23 member of the board they were trying to get this Philadelphia  
24 station. Second of all, I got information from ministers --  
25 from our ministers's conference from Philadelphia that they

1 were hoping that that would come through.

2 Q All right, now, focusing on the second paragraph of  
3 these minutes, were you aware prior to the time of this  
4 meeting that there had been a deadline established by the  
5 bankruptcy court and that the other events that are noted  
6 there were going to occur?

7 A Well, I had been aware that one of the reasons that  
8 we could possibly get the station that it did face bankruptcy.  
9 I don't believe I was aware of a deadline that had been until  
10 after I became a member of the board.

11 Q Now, moving down to the last substantive paragraph,  
12 had you been aware before the meeting of any sentiment for a  
13 motion such as the one noted here by Reverend Aguilar that the  
14 corporation attempt to acquire all or part of the assets of  
15 the Wilmington, Delaware television station for a sum not to  
16 exceed \$4,000,000?

17 A No, I was not aware of, you know, that that motion  
18 would have been made or was going to be made, have I agreed  
19 with it and voted for it.

20 Q Now, at the time you voted on this motion, I believe  
21 you testified in your direct testimony and in response to  
22 questions from Mr. Cohen that you had received a financial  
23 statement with respect to National Minority?

24 A Yes.

25 Q What understanding from that financial statement did

1 | you glean as to how much, if any, money National Minority owed  
2 | in respect to its operations?

3 |       A     I don't -- I can't really recall, I'm sorry, I don't  
4 | have a figure.

5 |       Q     Well, did you have an understanding at the time you  
6 | voted in favor of this motion by Reverend Aguilar as to what  
7 | the financial circumstances of National Minority were?

8 |       A     No.

9 |       Q     I'd like to focus your attention now on Bureau  
10 | Exhibit 386, and again, if you would, just take a minute to go  
11 | through it to familiarize yourself.

12 |       A     All right.

13 |       Q     Now, sir, my question is, had you received an agenda  
14 | before this meeting so as to alert you to what issues, you  
15 | know, may be discussed at the meeting?

16 |       A     No.

17 |       Q     Had you received any prior notice of any kind --

18 |       A     No.

19 |       Q     -- as to what issues would be discussed at the  
20 | meeting?

21 |       A     No.

22 |       Q     I'd like next to direct your attention to Bureau  
23 | Exhibit 394.

24 |       A     394, I'm sorry.

25 |       Q     Now, I would alert you at the outset that these



1 minutes reflect that you were unable to attend due to the  
2 problems that were occurring in Los Angeles at the time so --

3 A All right.

4 Q -- please keep that in mind as you read through  
5 this.

6 A Okay.

7 Q Sir, had you received an agenda before this special  
8 meeting so as to alert you to the issues that would be  
9 discussed?

10 A No.

11 Q Had you received any prior notice at any time as to  
12 what issues would be discussed at this meeting?

13 A No.

14 Q Next, I'd like to direct your attention to Bureau  
15 Exhibit 405 which will not be in the binder that you have, it  
16 will be in Binder No. 7.

17 A I'm getting used to it.

18 MR. COHEN: Do you need any assistance with that?

19 MR. HILL: No, no, I'm all right. This kind of  
20 favors my office so I'm okay. Okay, 4 0 who?

21 BY MR. SHOOK:

22 Q 405.

23 A Thank you. All right. Okay.

24 Q Now, sir, this appears to pertain solely to the  
25 Community Brace matter.

1 A Yes.

2 Q Are you aware of any other matters that were  
3 discussed at this meeting?

4 A No.

5 Q In the first paragraph when it speaks of all  
6 directors participating, am I to understand from this that you  
7 were physically present at this meeting?

8 A Yes.

9 Q Are you aware whether an agenda of this meeting was  
10 prepared beforehand and distributed to directors?

11 A No, but it was discussed.

12 Q And with whom was it discussed?

13 A I discussed it with Paul, I know, and I -- that's  
14 all I'm aware of.

15 JUDGE CHACHKIN: So you knew in advance they were  
16 going to discuss Community Brace --

17 MR. HILL: Yes.

18 BY MR. SHOOK:

19 Q And you received nothing in the mail that would  
20 suggest that say Reverend Aguilar was alerted beforehand as to  
21 what would be discussed.

22 A No.

23 Q All right, finally, I'd like to direct your  
24 attention to Bureau Exhibit 412, it's in the same binder.

25 A Yes, I'm familiar.

1 Q Thank you, sir, prior to the meeting noted here, had  
2 you received an agenda as to the matters that would be  
3 discussed at this meeting?

4 A Not an agenda but again I did talk to Paul and to  
5 Jane concerning these matters.

6 Q Can you tell me with matters in particular you spoke  
7 to Paul and Jane about?

8 A Okay, the idea that Phil Aguilar was going to -- or  
9 had submitted his resignation. It was one issue that my  
10 opinion was asked as to whether or not I knew Mr. Ramirez and  
11 I did and what I thought about it.

12 Q So Mr. Ramirez had been proposed to you as a  
13 possible addition to the board.

14 A As a possible -- yes, sir, and asked did I have an  
15 opinion and the television station in Odessa, I think that was  
16 the next motion, forgiving that \$650,000. That had been  
17 discussed beforehand several time.

18 Q And had that been --

19 A Not in official meetings.

20 Q Okay, but you had been alerted --

21 A I had been alerted to the matter and what it was  
22 about.

23 Q -- that there was a problem with repayment of that  
24 --

25 A That's right, and then finally, I believe, this

1 paragraph has to do whether or not we were going to have the  
2 same lawyers or different law firms for representation for  
3 this particular case and that had been discussed.

4 Q You ever see --

5 A But not in mail, no, no, there was not mail.

6 Q You had received oral information from either Mr.  
7 Crouch or Mrs. Duff about that?

8 A That's right, that's right.

9 Q Very good. Reverend, I'd like to direct you to  
10 paragraph 16 of your testimony.

11 A Thank you.

12 Q It appears on page 13.

13 A Paragraph 16, okay, I think I'm on page -- fine --  
14 okay.

15 JUDGE CHACHKIN: The witness has the document.

16 MR. SHOOK: Thank you.

17 BY MR. SHOOK:

18 Q I would like to direct your attention to the third  
19 sentence which as reformed reads "when I first heard about  
20 Minority Television I congratulated Dr. Crouch". Do you see  
21 that?

22 A Yes.

23 Q Now, what, if anything, had you heard about National  
24 Minority Television that caused you to congratulate Dr.  
25 Crouch?

1           A     Well, I had heard that it existed and I had heard  
2 that TBN had been the responsible entity of bringing it into  
3 being and that had given birth to this Minority Television  
4 station and having had been familiar with that kind of  
5 operation in the minority community, I was overwhelmed by it.

6           JUDGE CHACHKIN: What do you mean by that kind of  
7 operation in a minority community?

8           MR. HILL: Sir, all through the 60's and 70's to  
9 make a breakthrough and to get into what many people have  
10 called the main stream, governmental agencies including FCC  
11 have looked with favor with minor -- with majority-owned  
12 businesses assisting minorities to become a part of  
13 televisions, businesses or anything that could help them  
14 economically come into being and they have looked with favor  
15 to the extent that most governmental agencies have had special  
16 provisions for companies, majority companies who would assist  
17 minorities companies in to coming into being and getting on  
18 their feet.

19           JUDGE CHACHKIN: Yes, but wasn't NMTV to be a non-  
20 profit organization?

21           MR. HILL: But even in non-profit corporations such  
22 as churches and that would be my expertise, there are  
23 neighborhoods that cannot afford church buildings, they're not  
24 organized, they can't pay the preacher. Churches that are  
25 able take over, give birth, help build the buildings, pay for

1 the preacher, pay the utilities until they're able to walk.

2 JUDGE CHACHKIN: But where is there anything in NMTV  
3 which states that this goal is to do those things that you've  
4 just enunciated?

5 MR. HILL: Well, of course, I would point out three  
6 things. No. 1, if it's not in MTV it would be in FCC.

7 JUDGE CHACHKIN: What would be in FCC?

8 MR. HILL: That one of the reasons why Trinity would  
9 have any favor of owning additional stations is that they  
10 would prove that they are helping a minority television  
11 station to come into being.

12 JUDGE CHACHKIN: Yeah, but -- no, no, I'm not  
13 talking about help -- by a minority television station you  
14 mean in which the directors would be members of minorities,  
15 some of the directors, is that what you mean?

16 MR. HILL: Well, I would mean more than that. Even  
17 before you get down to who is a director and what have you,  
18 there are -- there is funds needed, there is directions  
19 needed, there is know-how. In my community where I live, just  
20 finding my way up into this building, I need assistance.

21 JUDGE CHACHKIN: But have you read the articles of  
22 incorporation of the predecessor to Minority which is the  
23 still the articles of incorporation of NMTV?

24 MR. HILL: No, I haven't.

25 JUDGE CHACHKIN: Well, you were furnished with a

1 copy, were you not?

2 MR. HILL: No.

3 JUDGE CHACHKIN: You were never furnished with a  
4 copy of the articles?

5 MR. HILL: Of incorporation?

6 JUDGE CHACHKIN: Yes.

7 MR. HILL: No.

8 JUDGE CHACHKIN: Well, the art --

9 MR. HILL: Oh, yes, yes, I'm sorry, I received the  
10 articles of incorporation and the by-laws of MTV, yes.

11 JUDGE CHACHKIN: All right, did you read the  
12 articles?

13 MR. HILL: Yes, I did, I'm not aware whether or not  
14 I'll be able to quote them.

15 JUDGE CHACHKIN: Well, is there anything in the  
16 articles which says anything about helping minorities?

17 MR. HILL: I'm not able to answer that.

18 JUDGE CHACHKIN: Well, let me show you the articles.

19 MR. HILL: Okay.

20 JUDGE CHACHKIN: And you tell me where it says  
21 anything about any of the items that you just mentioned as  
22 being a goal of this station.

23 MR. HILL: No, I have -- well, let me continue to  
24 read.

25 JUDGE CHACHKIN: All right, you read the entire

1 articles, I think it's just two pages.

2 MR. HILL: Yeah.

3 JUDGE CHACHKIN: But tell me if there's anything you  
4 see there which is anything consistent with what you just told  
5 me a station should be doing, it's goal.

6 MR. HILL: No, I don't see any --

7 JUDGE CHACHKIN: Don't you see that all they talk  
8 about there is just a religious ministry, it makes no mention  
9 of helping minorities.

10 MR. HILL: No, then that -- is this --

11 JUDGE CHACHKIN: This is the same articles, they  
12 only changed the name but it's the same articles --

13 MR. HILL: Well, they changed the name.

14 JUDGE CHACHKIN: That's right.

15 MR. HILL: All right, well, sir, of course, you  
16 being the expert in that matter, I couldn't --

17 JUDGE CHACHKIN: No, I'm just showing you what their  
18 articles say.

19 MR. HILL: Yeah, yeah.

20 JUDGE CHACHKIN: It's their goals.

21 MR. HILL: Yeah, but what I'm saying is I cannot  
22 envision, I -- my mind would be in houses and business and  
23 what have you but I cannot envision FCC approving TBN's  
24 purchasing of additional stations if there was not an  
25 agreement that they would help minority businesses.



1 JUDGE CHACHKIN: As far as I know that is not --  
2 that has nothing to do -- there is -- well, all I can tell  
3 you, sir, is that I don't know of any requirement the FCC that  
4 you help minority business, this is a broadcast station and  
5 broadcasting has nothing to do with helping minority  
6 businesses and all I could do is point to you the articles of  
7 incorporation which mention nothing about helping minority  
8 businesses or helping minority individuals. It only talks  
9 about religious programming.

10 MR. HILL: Well --

11 JUDGE CHACHKIN: You were not aware that what the  
12 articles -- what the goal -- or what the statements of the  
13 articles of incorporation said before you joined apparently.

14 MR. HILL: Apparently I wasn't. If -- but I would  
15 just like for the record --

16 JUDGE CHACHKIN: Yes.

17 MR. HILL: I would just like for the record to point  
18 out and it is -- it's followed in the next paragraph --

19 JUDGE CHACHKIN: Yes.

20 MR. HILL: -- I would like for the record that in my  
21 participation in federal government and particularly under the  
22 Reagan administration which this was a part of and under the  
23 Nixon administration --

24 JUDGE CHACHKIN: You're talking about the private  
25 sector initiative --